



ALLIANCE FOR NUCLEAR RESPONSIBILITY

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January 14, 2015

Mr. Michael Picker,
President
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Dr. Robert B. Weisenmiller,
Chairman
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Transmitted by email

Re: Grossly Inadequate Oversight of the AB 1632 Seismic Studies

Dear President Picker and Chairman Weisenmiller:

I attended the January 8 public meeting of the CPUC's Independent Peer Review Committee ("IPRP") on the same day President Picker was quoted in the *San Francisco Chronicle* saying "The CPUC needs to step up its game and show that safety is our top priority."¹

Based upon what PG&E announced at that meeting, it appears that each of your agencies needs to significantly "step up its game" regarding the ratepayer-funded reassessment of the seismic risks at the Diablo Canyon Nuclear Power Plant.

At the January 8 meeting, Dr. Norman Abrahamson -- PG&E's chief technical integrator for the Senior Seismic Hazard Analysis Committee ("SSHAC") Report going to the NRC this March -- blithely distributed the attached "hazard chart" and acknowledged that the six highest ranked uncertainties (each relating to earthquake-induced ground motions at the plant) have never before been presented to the IPRP. How can this be? Despite admitting that PG&E's void of site-specific ground motion data dominates Diablo Canyon's probabilistic seismic hazard, Dr. Abrahamson nonchalantly suggested this deficiency be addressed in PG&E's 2025 update.

Look at the chart carefully, and ponder the sizable differences in impact between what's been studied and what's been kept hidden until now. If you don't find this cavalier, ***just watch the video of Dr. Abrahamson's remarks here*** http://youtu.be/hXu_vn5gxMU (his discussion of the chart runs from 1:51:27 to 2:03:25) to appreciate the full effect.

¹ "State PUC blistered in audit for slow, sloppy probes," *San Francisco Chronicle*, January 8, 2015, accessible at <http://www.sfgate.com/news/article/State-PUC-blistered-in-audit-for-slow-sloppy-6001010.php>

How is it possible that five years into a \$62.5 million budget this hazard prioritization list is only coming to light now? How can PG&E (or the IPRP) rationalize spending so much on exotic data gathering techniques for lower-ranked items while ignoring more mundane approaches (e.g., digging a few boreholes at the plant site) to properly characterize the hazard-driving soil conditions in the 300-400 meters underneath Diablo Canyon's most significant structures? The infirmities in PG&E's approach to ground motion assumptions were prominently identified in 2013 by IPRP Report No. 6, so Dr. Abrahamson's revelations have a certain running-out-the-clock quality when seen in the context of PG&E's upcoming SSHAC Report to the NRC.

And by what twisted thought process would this subject be casually deferred to 2025?

Your two agencies have presided over this process since AB1632 was enacted in 2006. It is long past time to make certain that ratepayer-funded studies are properly hazard-prioritized and that State government find its voice amidst the continued false assurances by PG&E that gaping holes in the seismic analyses can simply be ignored. As President Picker phrased it, each Commission "needs to step up its game."

Sincerely,

/s/

Rochelle Becker
Executive Director

cc: service lists in A.12-11-009 and A.14-02-008

Hazard Sensitivity 5 Hz, PSA = 2g

